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28           **THE UNITED STATES DISTRICT COURT**

29           **FOR THE DISTRICT OF NEVADA**

30          PRINCIPAL FINANCIAL SERVICES, INC.,

31          Case No. 2:11-cv-00009-KJD-LRL

32                 Plaintiff,

33                 **SECOND STIPULATED MOTION TO**  
34                 **EXTEND DISCOVERY DEADLINES**

35          v.

36          PFRESOURCES, LLC, *et al.*

37                 Defendants.

1 Plaintiff PRINCIPAL FINANCIAL SERVICES, INC. ("Principal"), with the consent of  
2 Defendant PFRESOURCES, LLC ("PFR"), moves the Court for good cause, and not merely for  
3 purposes of delay, to amend the Stipulated Discovery Plan and Scheduling Order in this action.  
4

5 The parties jointly submitted their Stipulated Discovery Plan and Scheduling Order on March  
6 14, 2011. (Docket No. 27) On June 8, 2011, Principal filed a Stipulated Motion to Extend  
7 Discovery Deadlines, in light of open discovery issues amongst the parties. (Docket No. 33). The  
8 Court granted this Motion on June 15, 2011. (Docket No. 35)

9 The parties are actively engaged in settlement discussions and appear to be close to a  
10 resolution. In light of this development, PFR's counsel, Doris Nehme-Tomalka, expressly consented  
11 to the filing of this Motion during a telephone discussion with Principal's counsel, Rick Biagi, on  
12 July 12, 2011.

13 Accordingly, Principal moves the Court to amend the current Stipulated Discovery Plan and  
14 Scheduling Order by extending all dates in the Order by sixty (60) days, as follows:

15 Amending the Pleadings and Adding Parties:	August 26, 2011
16 Expert Disclosures:	September 24, 2011
17 Rebuttal Expert Disclosures:	October 25, 2011
18 Discovery Cut-Off Date:	November 22, 2011
19 Extensions/Modifications to Scheduling Order:	November 22, 2011
20 Dispositive Motion Deadline:	December 22, 2011
21 Pretrial Order Deadline:	January 21, 2012

22 **IT IS SO ORDERED.**

23 

24 \_\_\_\_\_  
U.S. MAGISTRATE JUDGE

25 \_\_\_\_\_  
26 Date: 7-15-11  
27 \_\_\_\_\_

Respectfully submitted,

*/s/ J. Scott Burrus*  
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## **CERTIFICATE OF SERVICE**

I hereby certify that on this 13<sup>th</sup> day of July, 2011, I electronically filed a copy of **SECOND STIPULATED MOTION TO EXTEND DISCOVERY DEADLINES**. Notice of this filing will be sent by operation of the Court's electronic filing system to the parties. Parties may access this filing through the Court's ECF system.

/s/ J. Scott Burris  
One of the Attorneys for Plaintiff